

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. et al.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

JUDGE CHRISTOPHER A. BOYKO

**JOINT MOTION FOR ENTRY OF ORDER GOVERNING DISCOVERY OF
ELECTRONICALLY STORED INFORMATION**

In accordance with Federal Rule of Civil Procedure 26(c), Plaintiff James Hayden and Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. jointly move the Court to enter the attached Stipulated Order Governing Discovery of Electronically Stored Information. The parties anticipate that discovery in this case will require the production of documents and things stored in various manners in the party's possession, custody or control. In accordance with Appendix K to this Court's Local Rules and in the interest of expediting discovery, protecting confidentiality interests, and limiting disputes regarding access to such information, the parties have conferred and have agreed to the terms of the attached Stipulated Order Governing Discovery of Electronically Stored Information. Therefore, the parties respectfully request that the Court grant this motion and enter the attached order.

DATED: August 6, 2019

/s/ Joshua L. Simmons

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CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2019, I electronically filed the foregoing Joint Motion for Entry of ESI Order with the Clerk of Court using the ECF system, which will send notification of such filing to all counsel of record, all of whom are registered ECF participants.

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